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October 30, 2006

via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463
RE: SEIU COPE, FEC ID C00004036
August Monthly Report (7/1/06 - 7/31/06)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated September 29, 2006 regarding the 2006 August Monthly Report filed by SEIU COPE. I will address each of the items in your letter in turn:

- 1) You ask us to clarify the expenditure for a Candidates Forum Breakfast which was reported on Schedule B. This expenditure was properly reported because the expenditure was not made on behalf of a candidate for Federal office. The candidate on whose behalf the forum was held (and he was the only candidate involved in the event) was a candidate for state office, specifically Governor of Maine.
- 2) You ask us for additional information regarding an expenditure for Media Productions reported on Line 21(b) of Schedule B. The expenditure was for a public communication, i.e., a billboard, which referred to a clearly identified Federal candidate. However, the communication did not expressly advocate the election or defeat of the candidate and was not an independent expenditure nor an in-kind contribution and was therefore properly reported on Line 21(b).

If you have any further questions regarding this mater, please feel free to contact me at 202-730-7465.

Very truly yours,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE

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